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WALTER WILHELM LAW GROUP
A Professional Corporation
Riley C. Walter #91839
Matthew P. Bunting #306034
Danielle J. Bethel #315945
205 East River Park Circle, Ste. 410
Fresno, CA 93720
Telephone: (559) 435-9800
Facsimile: (559) 435-9868
E-mail: rileywalter@w2lg.com

Chapter 9 Counsel

MCCORMICK BARSTOW, LLP
Timothy L. Thompson #133537
Mandy L. Jeffcoach #232313
Niki E. Cunningham #277976
7647 N. Fresno Street
Fresno, CA 93720
Telephone: (559) 433-1300
Facsimile: (559) 433-2300
E-mail: mandy.jeffcoach@mccormickbarstow.com

District Counsel

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-1

Chapter 9

Date: October 12, 2017
Time: 10:30 a.m.
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

**NOTICE OF MOTION FOR AUTHORIZATION TO REJECT EXECUTORY CONTRACT
(HEALTHCARE CONGLOMERATE ASSOCIATES, LLC)**

PLEASE TAKE NOTICE that a hearing on Debtor's Motion For Authorization to
Reject Executory Contract dated May 29, 2014 (HealthCare Conglomerate Associates,

1 LLC) will be held before the Honorable René Lastreto II on October 12, 2017 at 10:30
2 a.m. at the above listed date, time, and courtroom, at the United States Courthouse
3 located at 2500 Tulare Street, in Fresno, California pursuant to an Order Shortening
4 Time entered on October 10, 2017.

5 The Motion and supporting papers are being served on the interested parties
6 pursuant to Sections 365 and 901.

7 By the Motion the Debtor seeks an order entirely rejecting the following Contract¹
8 between Tulare Local Healthcare District and Healthcare Conglomerate Associates,
9 LLC consisting of four agreements dated May 29, 2014 titled:

- 10 1. Interim Joint Operating Agreement (to extent still existent);
- 11 2. Joint Operating Agreement;
- 12 3. Management Services Agreement; and
- 13 4. Option Agreement.

14 Objections to the Motion may be raised at commencement of the hearing on the
15 Motion.

16 Dated: October 10, 2017

WALTER WILHELM LAW GROUP,
a Professional Corporation

18
19 By:



Riley C. Walter, Attorneys for Debtor,
Tulare Local Healthcare District

28 ¹ Copies of the Contract may be obtained by sending an email to galfano@w2lg.com or
niki.cunningham@mccormickbarstow.com.